

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ZENIMAX MEDIA INC. and ID SOFTWARE LLC

Plaintiffs,

v.

OCULUS VR, LLC, PALMER LUCKEY AND
FACEBOOK, INC.,

Defendants.

Case No.: 3:14-cv-01849-P

**APPENDIX TO DEFENDANTS' OPPOSITION TO TO PLAINTIFFS' MOTION FOR A
PROTECTIVE ORDER LIMITING TOPICS IN DEFENDANTS' NOTICES OF RULE
30(B)(6) DEPOSITIONS (ECF NO. 271)**

<u>Document</u>	<u>Exhibit</u>	<u>Page(s)</u>
Plaintiffs' Rule 30(b)(6) Deposition Notice to Facebook, Inc.	A	1-8
Plaintiffs' Rule 30(b)(6) Deposition Notice to Oculus VR, LLC	B	9-17

Date: December 30, 2015

Respectfully submitted,

/s/ Heidi L. Keefe

Richard A. Smith
Texas Bar No. 24027990
richard@rsmithpc.com
RICHARD SMITH PC
Campbell Centre I
8350 N. Central Expressway
Suite 1111
Dallas, Texas 75206
Phone: (214) 242-6484

Elizabeth Y. Ryan
Texas Bar No. 24067758
eryan@lynnllp.com
LYNN TILLOTSON PINKER & COX LLP
2100 Ross Avenue, Suite 2700
Dallas, Texas 75201
Phone: (214) 981-3800
Fax: (214) 981-3839

Michael G. Rhodes (*pro hac vice*)
mrhodes@cooley.com
COOLEY LLP
101 California St., 5th Floor
San Francisco, California 94111
Phone: (415) 693-2000

Heidi L. Keefe (*pro hac vice*)
hleefe@cooley.com
Mark R. Weinstein (*pro hac vice*)
mweinstein@cooley.com
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Phone: (650) 843-5000

*Attorneys for Defendants
Oculus VR, LLC, Palmer Luckey and Facebook,
Inc.*

CERTIFICATE OF SERVICE

On December 30, 2015, I hereby certify that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). I hereby certify that I have served all counsel who are deemed to have consented to electronic service or by another manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Heidi L. Keefe
Heidi L. Keefe